REMARKS/ARGUMENTS

Claims 16-31 are pending in this application. By this Amendment, Applicant amends the specification, the drawings, and Claims 16 and 18.

Claims 20, 21, 23, and 26-28 have been withdrawn from further consideration as being directed to non-elected species. Non-elected Claims 20, 21, 23, and 26-28 are dependent upon generic Claim 18. Accordingly, Applicant respectfully requests that the Examiner rejoin and allow Claims 20, 21, 23, and 26-28 when generic Claim 18 is allowed.

Claims 16, 18, 19, and 22 were rejected under 35 U.S.C. § 102(e) as being anticipated by Oka et al. (JP 2000-353872). Claims 17, 24, 25, 30, and 31 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Oka et al. in view of Kondo et al. (U.S. 6,855,625). Claim 29 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Oka et al. in view of Fukuta et al. (U.S. 5,456,778). Applicant respectfully traverses the rejections of Claims 16-19, 22, 24, 25, and 29-31.

Claim 16 has been amended to recite:

> An internal conductor connection structure comprising:
> an insulator substrate including a plurality of insulating layers;
> line conductors disposed in the insulator substrate; and
> at least two via conductors adjacent each other at a predetermined interval in the insulator substrate, at least one of the at least two via conductors including a continuous via conductor arranged to extend in a direction away from the other via conductor; wherein
> the at least one of the at least two via conductors is connected to one of the line conductors through the continuous via conductor;
> the continuous via conductor has a dimension in a direction in which the line conductors extend that is greater than a dimension of the at least two via conductors in the direction in which the line conductors extend;
> the continuous via conductor is disposed in one of the plurality of insulating layers;
> one of the at least two via conductors is disposed in another one of the plurality of insulating layers that is different from the one of the plurality of insulating layers in which the continuous via conductor is disposed; and
> **one end portion of the continuous via conductor is directly**

> **connected to the one of the at least two via conductors, and an opposite end portion, but not the one end portion, of the continuous via conductor is directly connected to the one of the line conductors**. (emphasis added)

Applicant's Claim 18 recites features that are similar to the features recited in Applicant's Claim 16, including the above-emphasized feature.

The Examiner alleged that Oka et al. teaches all of the features recited in Applicant's Claims 16 and 18, including at least two via conductors 3 adjacent to each other, and a continuous via conductor 7 having a dimension in a direction in which the line conductors 4 extend that is greater than a dimension of the at least two via conductors 3.

Applicant's Claims 16 and 18 have been amended to recite the feature of "one end portion of the continuous via conductor is directly connected to the one of the at least two via conductors, and an opposite end portion, but not the one end portion, of the continuous via conductor is directly connected to the one of the line conductors." Support for this feature is found, for example, in paragraph [0037] and Figs. 1A and 3A-3C of Applicant's originally filed application.

In contrast to Applicant's Claims 16 and 18, as shown in Figs. 1 and 8 of Oka et al., **both end portions** of each of the through-hole conductor sections 7, which the Examiner alleged correspond to the continuous via conductor recited in Applicant's Claims 16 and 18, are **directly connected to the through holes 3**, which the Examiner alleged correspond to the via conductors recited in Applicant's Claims 16 and 18. None of the through-hole conductor sections 7 of Oka et al. include any ends that are directly connected to any of the wiring sections 4, which the Examiner alleged correspond to the line conductor recited in Applicant's Claims 16 and 18. Oka et al. neither teaches nor suggests that the through-hole conductor sections 7 could or should include ends that are directly connected to any of the wiring sections 4.

Thus, Oka et al. clearly fails to teach or suggest the feature of "one end portion of

the continuous via conductor is directly connected to the one of the at least two via conductors, and an opposite end portion, but not the one end portion, of the continuous via conductor is directly connected to the one of the line conductors" as recited in Applicant's Claims 16 and 18.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection of Claims 16 and 18 under 35 U.S.C. § 102(e) as being anticipated by Oka et al.

The Examiner relied upon Kondo et al. and Fukuta et al. to allegedly cure deficiencies of Oka et al. However, Kondo et al. and Fukuta et al. fail to teach or suggest the feature of "one end portion of the continuous via conductor is directly connected to the one of the at least two via conductors, and an opposite end portion, but not the one end portion, of the continuous via conductor is directly connected to the one of the line conductors" as recited in Applicant's Claims 16 and 18. Thus, Applicant respectfully submits that Kondo et al. and Fukuta et al. fail to cure the deficiencies of Arima et al. described above.

Accordingly, Applicant respectfully submits that Oka et al., Kondo et al., and Fukuta et al., applied alone or in combination, fail to teach or suggest the unique combination and arrangement of features recited in Applicant's Claims 16 and 18.

In view of the foregoing amendments and remarks, Applicant respectfully submits that Claims 16 and 18 are allowable. Claims 17, 19, 22, 24, 25, and 29-31 depend upon Claims 16 and 18, and are therefore allowable for at least the reasons that Claim 16 and 18 are allowable. In addition, Applicant respectfully requests that non-elected Claims 20, 21, 23, and 26-28 be rejoined and allowed with generic Claim 18.

In view of the foregoing amendments and remarks, Applicant respectfully submits that this application is in condition for allowance. Favorable consideration and prompt allowance are solicited.

The Commissioner is authorized to charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1353.

Respectfully submitted,

Dated: June 19, 2009

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